

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
CORPUS CHRISTI DIVISION

MARC VEASEY et al., §  
*Plaintiffs,* §  
§  
v. § Civil Action No. 2:13-cv-193 (NGR)  
GREG ABBOTT, et al., §  
*Defendants,* §

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**STATE DEFENDANTS' UNOPPOSED MOTION TO WITHDRAW  
AND SUBSTITUTE COUNSEL**

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Defendants, Greg Abbott, in his official capacity as Governor of Texas, the Secretary of State<sup>1</sup>, in the official capacity, and the State of Texas (collectively, the “State Defendants”), file this Unopposed Motion to Withdraw and Substitute Counsel. In support, State Defendants state the following:

1. The following legal counsel of record for State Defendants are no longer employed with the Texas Attorney General’s Office: Kyle Hawkins, Scott Keller, Arthur D’Andrea, Matthew Frederick, Jason LaFond, Stephen Ronnie Keister, and Dominique G. Stafford.
2. Additionally, Assistant Attorney General Jennifer Roscetti, who is also listed as counsel of record for State Defendants, is no longer involved in the above-referenced cause.
3. Accordingly, the undersigned counsel submits that there is good cause to withdraw these individuals as legal counsel of record in the above-referenced cause and that they be removed from all correspondence and notifications. The withdrawal will not delay these proceedings.

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<sup>1</sup> Ruth R. Hughs resigned as Secretary of State effective May 31, 2021.

3. State Defendants request that Assistant Attorney General Summer R. Lee be substituted as lead counsel in the above-referenced cause. Mrs. Lee may be contacted through the information provided below:

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For the foregoing reasons, State Defendants respectfully request that the Court grant this motion to withdraw legal counsel and substitute Assistant Attorney General Summer R. Lee as lead counsel in the above-captioned cause.

Respectfully submitted,

KEN PAXTON  
Attorney General of Texas

BRENT WEBSTER  
First Assistant Attorney General

GRANT DORFMAN  
Deputy First Assistant Attorney General

SHAWN COWLES  
Deputy Attorney General for Civil Litigation

THOMAS A. ALBRIGHT  
Chief for General Litigation Division

/s/ Summer R. Lee

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**COUNSEL FOR STATE DEFENDANTS**

**CERTIFICATE OF CONFERENCE**

I hereby certify that Plaintiffs' counsel has been contacted regarding this motion and have advised that they are unopposed.

*/s/ Summer R. Lee*  
**SUMMER R. LEE**  
Assistant Attorney General

**CERTIFICATE OF SERVICE**

I hereby certify that on August 18, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to all registered CM/ECF users.

*/s/ Summer R. Lee*  
**SUMMER R. LEE**  
Assistant Attorney General